

APR 18 2007



April 6, 2007

Mr. Ivan Huntoon  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
Room 462  
901 Locust Street  
Kansas City, MO 64106

RE: CPF 3-2007-1009W

Dear Mr. Huntoon:

Northern Natural Gas (Northern) received a Warning Letter dated February 26, 2007, from the US Department of Transportation-Pipeline and Hazardous Material Safety Administration (PHMSA) resulting from Michigan Public Service Commission audits of Northern facilities in the Negaunee, Michigan area during the period of August 15-17, 2006. Although Northern understands that a formal response is not required, Northern is submitting this letter for the record in response to the issue noted in the Warning Letter.

The following is an excerpt from the Warning Letter with Northern's response in italics:

**1. §192.491 Corrosion control records.**

**(b) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§ 192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.**

**"During the M-35 replacement project, the inside of the pipeline was observed for internal corrosion, but an inspection report was not completed. Your personnel indicated that the inspection was done but not documented."**

*Northern has reviewed this matter and determined that the corrosion specialist completed the Pipeline Inspection Program for Excavation (PIPE) form but did not check the box indicating that there was no corrosion. To address this issue, a bulletin has been sent to all field personnel regarding the importance of completing all boxes on the PIPE form and Northern will continue to monitor this documentation.*

**2. §192.225 Welding procedures.**


- (a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (ibr, see §192.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (ibr, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).**

**"According to the API 1104 Welder Qualification Test report, one of the welders that worked on the M-35 replacement project was not qualified correctly to API 1104 standards. The correct number of destructive tests were not performed; only two root-bend tests were used for branch-on-pipe multiple welding qualification. The welder was listed as qualified for branch-on-pipe welding even though API 1104 section 6.3.1 requires four Nick-Break tests for multiple welding qualification."**

*Northern has reviewed the M-35 project records and found that the welder was properly qualified for the weld type (butt welds) used on this project and the proper number of destructive tests were performed. However the format of the welder qualification form currently may lead to some confusion regarding the type(s) of welding qualified. Therefore, Northern is currently reviewing the welder qualification form, will make revisions to clarify the form and ensure that welding inspectors are properly trained. To improve tracking of welder qualifications and ensure that proper documentation is available, a welder qualification library has been established within Northern's electronic document tracking system where all of this information will be stored and will be readily accessible.*

Northern trusts that this response adequately addresses the concerns of the Warning Letter. Please contact me at (402) 398-7715 if you have any questions or require additional information in regard to this letter.

Sincerely,



Thomas Correll

Director Pipeline Safety and Integrity